



February 16, 2001

Mr. Bill Lowe
U.S. Environmental Protection Agency
Region VII, ARTD/RCAP
Unit Leader
RCRA Corrective Action & Permits Branch
Air, RCRA and Toxics Division
901 N. 5th Street
Kansas City, KS 66101

Re: RCRA Facility Investigation
EPA Identification No. KSD007246846
Safety-Kleen (Wichita), Inc. Facility
2549 North New York Avenue
Wichita, Kansas



Dear Mr. Lowe:

This letter is a follow-up to our meeting of Thursday, February 1, 2001, when we agreed that additional data are needed to: assess the preliminary characterization of the site; and, to evaluate RFI data adequacies for the Safety-Kleen (Wichita) Inc. (SKW) facility. This letter is being submitted by Safety-Kleen Consulting (SKC) on behalf of SKW.

Based on our conversations in that meeting, it was agreed that additional groundwater sampling points should be included and that a second round of sampling/gauging should be conducted before further decisions are made with respect to future RFI work at the site. As a result, we intend to conduct the following scope of work in the near term to further the RFI evaluation process:

Well Installation, Development, Gauging and Sampling

- Obtain legal access to Union Pacific Railroad (UPRR) property to the north of the facility for purposes of installing a deep well adjacent to MW-14 to form a well pair.
- Install one upgradient deep well on UPRR property adjacent to MW-14. This well will be labeled SK-7(D) and set atop the Welling ton Shale, screening the base of the alluvial unconsolidated flow zone.
- Gauge and sample the facility wells (SK-1 through SK-6, including shallow and deep pairs, where present, and RSC-1 and HRI-3). To the extent practicable, this will be conducted in conjunction with the NIC April 2001 gauging and sampling effort.



- Gauge and sample the following upgradient UPRR monitoring wells and the newly installed well on UPRR's property: MW-11, MW-10, MW-14, SK-7(D) and WND-32. To the extent practicable, the gauging and sampling event will be conducted in conjunction with the NIC April 2001 gauging and sampling effort.
- The drilling, monitoring well installation, monitoring well development, gauging and sampling will be conducted in accordance with the RFI Work Plan (dated October 14, 1999).
- We will coordinate the groundwater sampling event with both the U.S. Environmental Protection Agency (USEPA) and the Kansas Department of Health and Environment (KDHE) to provide the opportunity to split the groundwater samples.

East Fork Chisolm Creek Water Sampling

Water samples will be obtained from the midstream portion of the creek located east of the facility at the following locations:

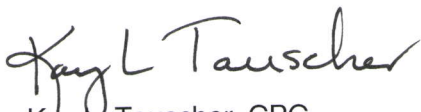
- Approximately 250 feet upstream from the facility (before the concrete-lined section of the creek),
- Adjacent to the S-K facility;
- Approximately 200 feet downstream of the facility; and,
- Immediately downstream of the Coastal-Derby facility (within the concrete-lined section of the creek).


The sampling will be conducted by wading into the creek downstream of the sampling location, lowering a capped sampling jar into the creek to near the bottom, and opening the jar while submerged to fill. The jar will be recapped while still submerged in the water. The sampling point furthest downstream of the facility will be sampled first, then the next most downstream sample, and so on until the most upstream sample has been collected. This will assist in sampling water that hasn't been impacted by disturbed bottom sediment.

Closing

Upon receipt and evaluation of these data, as well as further evaluation of existing NIC data, SKC will provide USEPA and KDHE with a proposed plan to address the on-site soil issues and further groundwater evaluation activities. Assuming timely access to UPRR's property can be obtained (i.e., less than 30 days), we anticipate that the scope of work described herein can be conducted, evaluated and summarized by May 15, 2001. If you have any questions on this letter, please contact Kay Tauscher at 303.938.5535.

Sincerely,


Kay L. Tauscher, CPG
Project Hydrogeologist


Phil Cavendor
Project Geologist

cc: C. Jump
J. Arbuthnot
G. Jones
R. Robertson
J. McDermott